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February 7, 2025

Via ECF

Magistrate Judge Sarah L. Cave
United States Magistrate Judge
Southern District Of New York
500 Pearl Street, Room 1670
New York, NY 10007

Re: Samuels v. Barnard College,
Civil Action No.: 1:23-cv-06181-PAE-SLC

Dear Magistrate Judge. Cave:

I am an attorney in the Office of the General Counsel of Barnard College, defendant in the above referenced action, and will now also be participating in the defense of this matter. I shall be filling a notice of appearance later today.

On the strength of the Answer recently filed, Barnard College believes that it has a very strong motion for judgment on the pleadings. I shall be handling that motion and expect to be able to file the motion before the end of this month. The final decision to proceed with this motion was made post-case management filing. At the conference schedule for this coming Monday, Defendant would like to discuss the possibility of not commencing discovery until a decision has been made on the motion.

I appreciate the Court's attention to this matter and apologize for the inconvenience.

Respectfully submitted,
/s/
William S.J. Fraenkel
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